

February 20, 2009 Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary

Office of the Secretary

Federal Communications Commission 445 12th Street, SW, Suite TW-A325

Washington, DC 20554

RE: HOS Interest - 2008 CPNI Certification Filing

EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 07, 2009, enclosed for filing please find the 2008 Annual CPNI Compliance Certification submitted on behalf of HOS Interest, as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 407-740-3004 or via email to rnorton@tminc.com.

Sincerely,

Robin Norton

Consultant to HOS Interest

Robin Noton

RN/lm

cc:

Best Copy and Printing, Inc. - FCC@BCPIWEB.COM

cc: FCC Enforcement Bureau (2 copies)

cc:

Manuel Alaniz - HOS

file:

HOS Interest - FCC

tms:

FCCx0901

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE <u>EB</u> Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: 2008

Name of company covered by this certification:

HOS Interest

Form 499 Filer ID:

822220

Name of signatory:

Manuel Alaniz

Title of signatory:

President

I, Manuel Alaniz, certify and state that:

- I am the President of HOS Interest and, acting as an agent of the company, I have personal knowledge of HOS Interest's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
- 2. I hereby certify that, to the best of my knowledge, information and belief, HOS Interest's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
- 3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64,2001 et seq. of the Commission's rules.

Manuel Alania, President

02-19-0 te

Date

Exhibit A
Statement of CPNI Procedures and Compliance

Statement of CPNI Procedures and Compliance For 2008 HOS Interest, LLC

HOS Interest operates solely as an operator service provider and as such provides only operator assisted call completion services for transient end users. Therefore, the only service consists of casual traffic provided outside of any subscribed service relationship, and I do not obtain or retain any CPNI that could be used for marketing purposes. My marketing efforts do not require and do not use any end user information at all.

We do not provide call detail information over the telephone. All customer service personnel are trained not to discuss call detail information unless the calling party can identify the call detail related to their inquiry. Inbound callers into customer service must provide the call detail information to the Customer Service Representatives (from the bill they received) as well as their names prior to before any assistance is provided. The only information provided comes directly from the billed information. The caller must have the call detail/bill when calling and must be the name on the account.

We do not disclose call detail on line to end users under any circumstances. We do not have a subscriber relationship with our customers, and do not have customer accounts.

As an operator services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have processes in place to safeguard the call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to these records. All call detail is stored in a database that is protected; only authorized personnel have access to the database. It is not accessible by anyone outside the company.

There was no breach of call detail information during 2008. But should such a breach occur, we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2008.

Due to the nature of the operator services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.